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as Trustee of SORENSEN RESEARCH AND
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND
DEVELOPMENT TRUST,

Plaintiff,

v.

HELEN OF TROY Texas Corporation;
OXO International Ltd.; and DOES 1-
100,

Defendants.

) Case No. 07-CV-02278-BTM-CAB
)
) **DECLARATION OF MELODY A.**
) **KRAMER IN SUPPORT OF**
) **PLAINTIFF'S OPPOSITION TO**
) **DEFENDANT'S MOTION TO STAY**
) **PENDING OUTCOME OF**
) **REEXAMINATION PROCEEDINGS**
)
) Date: February 22, 2008
) Time: 11:00 a.m.
) Courtroom 15 – 5th Floor
) The Hon. Barry T. Moskowitz
)
) *NO ORAL ARGUMENT*
) *UNLESS REQUESTED BY THE COURT*
)
)
)
)
)

1 I, MELODY A. KRAMER, declare:

2 1. I am not a party to the present action. I am over the age of eighteen. I
3 have personal knowledge of the facts contained within the following paragraphs, and
4 could and would competently testify thereto if called as a witness in a court of law.

5 2. At all times relevant herein I have been an attorney for Sorensen
6 Research and Development Trust ("SRDT"), Plaintiff in the above-captioned matter.

7 3. This Declaration is being submitted in conjunction with Plaintiff's
8 Opposition to Defendant's Motion for Stay Pending Outcome of Reexamination
9 Proceedings.

10 4. Prior to filing this case, I located publicly available records from the
11 Texas Secretary of State's office identifying Defendant Helen of Troy Texas
12 Corporation as an existing Texas corporation. A copy of the printout from the
13 official website is attached hereto as Exhibit A.

14
15 RESPECTFULLY SUBMITTED this Friday, February 08, 2008.

16
17 JENS ERIK SORENSEN, as Trustee of
18 SORENSEN RESEARCH AND DEVELOPMENT
19 TRUST, Plaintiff

20 /s/ Melody A. Kramer

21 _____
22 Melody A. Kramer, Esq.
23 Attorney for Plaintiff
24
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28

PROOF OF SERVICE

I, J. Michael Kaler declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kaler Law Offices, 9930 Mesa Rim Road, Suite 200, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On February 8, 2008, I served on the parties to this action the following documents:

**DECLARATION OF MELODY A. KRAMER IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION TO STAY PENDING OUTCOME OF
REEXAMINATION PROCEEDINGS**

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Erik B. Von Ziepel Seyfarth Shaw LLP 2029 Century Park East, Suite 3300 Los Angeles, CA 90067 evonzeipel@seyfarth.com	Helen of Troy Texas Corporation; Oxo International Ltd.	Email--Pleadings Filed with the Court via CM/ECF

- ☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
- ☐ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.
- ☐ (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.
- ☐ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.
- ☒ (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

1 I declare that the foregoing is true and correct, and that this declaration was executed on Friday,
2 February 8, 2008, in San Diego, California.

3 /s/ J. Michael Kaler

4

J. Michael Kaler

EXHIBIT A



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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 25383100 **Entity Type:** Domestic For-Profit Corporation
Original Date of Filing: November 22, 1968 **Entity Status:** In existence
Formation Date: N/A
Tax ID: 17416180135 **FEIN:**
Duration: Perpetual
Name: HELEN OF TROY TEXAS CORPORATION
Address: 1 HELEN OF TROY PLAZA
 EL PASO, TX 79912 USA

REGISTERED AGENT	FILING HISTORY	NAMES	ASSUMED ASSOCIATED ENTITIES
Last Update	Name	Title	Address
October 1, 2006	GERALD J RUBIN	DIRECTOR	1 HELEN OF TROY PLAZA EL PASO, TX 79912 USA
October 1, 2006	GERALD J RUBIN	PRESIDENT	1 HELEN OF TROY PLAZA EL PASO, TX 79912 USA
October 1, 2006	THOMAS J BENSON	DIRECTOR	1 HELEN OF TROY PLAZA EL PASO, TX 79912 USA
October 1, 2006	THOMAS J BENSON	SENIOR VP	1 HELEN OF TROY PLAZA EL PASO, TX 79912 USA
October 1, 2006	VINCENT D CARSON	DIRECTOR	1 HELEN OF TROY PLAZA EL PASO, TX 79912 USA
October 1, 2006	VINCENT D CARSON	VICE PRESIDENT	1 HELEN OF TROY PLAZA EL PASO, TX 79912 USA

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